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July 31, 1997

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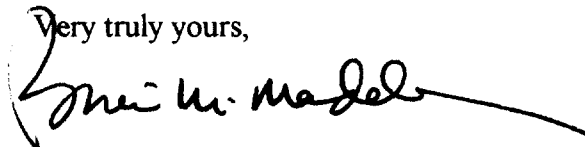
Mr. William F. Caton
Acting Secretary
1919 M Street, NW
Room 222
Washington, DC 20554

Dear Mr. Caton:

On behalf of Sarkes Tarzian, Inc., licensee of Station WRCB-TV, Chattanooga, Tennessee, there is transmitted herewith an original and four copies of its *Reply to Opposition to Petition for Partial Reconsideration*, submitted in MM Docket No. 87-268.

If any additional information is desired in connection with this matter, please contact the undersigned counsel.

Very truly yours,



Brian M. Madden

BMM/tlm
Enclosure

cc: Milton Grant

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BEFORE THE

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Federal Communications Commission

WASHINGTON, D.C. 20554

JUL 31 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Advanced Television Systems and
Their Impact Upon the Existing
Television Broadcast Service

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MM Docket No. 87-268

To: The Commission

**REPLY TO OPPOSITION TO
PETITION FOR PARTIAL RECONSIDERATION**

Sarkes Tarzian, Inc. ("STI"), licensee of Station WRCB-TV, Chattanooga, Tennessee, by its attorneys and pursuant to Section 1.429 of the Commission's rules, hereby submits this brief response to the *Opposition to Petition for Partial Reconsideration* filed herein by Huntsville Television Acquisition Corp. ("HTAC"), licensee of Station WZDX(TV), Channel 54, Huntsville, Alabama. HTAC is concerned that the operation of Station WRCB-TV on its assigned DTV allotment of Channel 55 not be permitted to create additional interference to the NTSC operation of Station WZDX in the event that STI constructs the transmitter site for DTV Channel 55 outside of the three-mile zone established by the Commission for site relocation without regard to interference considerations.

As indicated in the accompanying Engineering Statement of Bernard R. Segal, P.E. (the "*Engineering Statement*"), STI proposed that certain relocation of DTV transmitter sites be treated with additional flexibility, but not in the circumstances applicable to HTAC's


Huntsville station. STI was concerned about “doughnut hole” interference — a condition that occurs, as Mr. Segal observes, “when the transmitter site of the undesired station is located within the Grade B contour [of an NTSC station], or in the case of a DTV station, within the noise-limited contour, of the desired station.” *Engineering Statement* at 1. As explained by STI in its *Petition for Partial Reconsideration*, such interference arises between the DTV operation of Station WRCB-TV and the NTSC operation of Station WFLI(TV), Channel 53, Cleveland, Tennessee, because the reference coordinates for the DTV allotment for Station WRCB-TV are located within the Grade B contour of Station WFLI. *See Petition for Partial Reconsideration* at 3-5. STI proposes that, in circumstances where “doughnut hole” interference exists, the Commission permit a nominal increase in such interference, in the range of not more than 25 percent, caused by a proposed modification of a DTV allotment, including a site relocation either within or outside of the three-mile zone adopted by the Commission. *Id.* at 5.

However, as Mr. Segal notes, there is no current possibility of “doughnut hole” interference caused to Station WZDX, even were STI to relocate the DTV transmitter site for Station WRCB-TV approximately 3.5 - 6 miles northwest of the present DTV reference coordinates, as now anticipated. *Engineering Statement* at 2. Accordingly, HTAC’s concern is unfounded. STI’s proposal, as set forth in its *Petition for Partial Reconsideration*, would not affect the Commission’s requirement that STI avoid increased interference to Station WZDX in connection with any site relocation that may be proposed for the DTV operation of Station WRCB-TV.

For the reasons explained in its *Petition for Partial Reconsideration*, STI continues to urge that the Commission reconsider and modify the rules adopted in the *Sixth Report and Order* in this proceeding to provide an appropriate degree of needed flexibility in modifying DTV allotments in cases involving "doughnut hole" interference.

Respectfully submitted,

SARKES TARZIAN, INC.

By 

Brian M. Madden
Leventhal, Senter & Lerman P.L.L.C.
2000 K Street, NW
Suite 600
Washington, DC 20006

Its Attorneys

July 31, 1997

Bernard R. Segal, P.E.
Consulting Engineer
Washington, DC

**ENGINEERING STATEMENT
PREPARED ON BEHALF OF
SARKES TARZIAN, INC.
CHATTANOOGA, TENNESSEE**

The instant engineering statement has been prepared on behalf of Sarkes Tarzian, Inc. (hereafter, STI), licensee of television station WRCB-TV, Chattanooga, Tennessee. This statement supports a reply to the "Opposition to Petition of Partial Reconsideration" by Huntsville Television Acquisition Corp. (hereafter, HTAC) to STI's "Petition for Partial Reconsideration" of the FCC *Sixth Report and Order* in MM Docket Number 87-268.

HTAC is the licensee of station WZDX, Huntsville, Alabama, NTSC channel 54. In the *Sixth Report and Order*, the FCC allotted channel 55 for DTV use by station WRCB-TV. In its "Petition for Partial Reconsideration", STI requested some relief from the Commission's constraint against increased interference to other stations, but only for situations involving so-called "doughnut hole" interference. That is a condition that arises when the transmitter site of the undesired station is located within the Grade B contour, or in the case of a DTV station, within the noise-limited contour, of the desired station. HTAC objects on the grounds that the relief sought by STI would result

Bernard R. Segal, P.E.
Consulting Engineer
Washington, DC


Engineering Statment
Sarkes Tarzian, Inc., Chattanooga, Tennessee

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in increased interference to WZDX by WRCB-TV. HTAC has misinterpreted STI's requested relief insofar as its prospective impact on WZDX is concerned.

WZDX is located 123.7 kilometers (76.9 miles) from the existing WRCB-TV site. The NTSC facilities for WZDX (2240 kW (MAX-DA), 515 meters) result in the station's Grade B contour extending approximately 80 kilometers (50 miles) in the direction toward WRCB-TV. Thus, the "doughnut hole" interference condition that was the subject of the STI Petition, would not arise from the WRCB-TV DTV, channel 55, operation at the existing site or at a new site that is expected to be 3.5 to 6 miles northwest of the existing site. STI's proposal in no way would affect the current requirement to avoid increased interference to WZDX for any site relocation that exceeded the three-mile limit set forth by the FCC for avoiding the need to make special interference studies.

HTAC has misconstrued STI's proposal insofar as its prospective impact on WZDX is concerned.


Bernard R. Segal, P.E.

July 30, 1997

CERTIFICATE OF SERVICE

I, Tamara L. Mariner hereby certify that a true and correct copy of the foregoing
Reply to Opposition to Petition for Partial Reconsideration was sent by first-class postage
prepaid mail this 31st day of July, 1997 to the following:

Milton Grant
Huntsville Television Acquisition Corp.
P.O. Box 3889
Huntsville, AL 35810


Tamara L. Mariner